

Case No. 25-1345

**UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

KILMAR ARMANDO ABREGO GARCIA, ET AL.,
Plaintiffs-Appellees,

v.

KRISTI NOEM, ET AL.,
Defendants-Appellants.

On Appeal from the U.S. District Court
for the District of Maryland
Case No. 8:25-CV-00951-PX

**MOTION OF *AMICI CURIAE* FOR LEAVE TO FILE BRIEF
IN SUPPORT PLAINTIFFS-APPELLEES**

MOTION FOR LEAVE TO FILE BRIEF AS *AMICI CURIAE*

Pursuant to Federal Rule of Appellate Procedure 29(a)(3), Professors Erwin Chemerinsky, Martha Minow, and Laurence Tribe respectfully move for leave to submit a brief as *amici curiae* in support of Plaintiffs-Appellees. In support of their motion, *amici* state the following:

1. *Amici* are constitutional law professors at the University of California, Berkeley, School of Law and Harvard Law School, respectively. *Amici* are world-renowned scholars of constitutional law who collectively have authored scores of journal articles and books addressing constitutional issues including separation of powers and the limits of Executive Branch power.

3. *Amici* believe that the views set forth in the attached brief would aid this Court in the resolution in this case.

4. Consistent with Federal Rule of Appellate Procedure 29(a)(3), *amici* have received consent from Plaintiffs-Appellees to file this brief. Due to the time constraints of this emergency appeal, however, *amici* have been unable to receive the consent of Defendants-Appellants.

For these reasons, *amici* respectfully request that the Court grant this motion and allow their participation as *amici curiae* in support of Plaintiffs-Appellees, and that the Court permit *amici* to file the accompanying *amici curiae* brief.

Dated: April 6, 2025

/s/ Erwin Chemerinsky

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CERTIFICATE OF SERVICE

A true and correct copy of this motion, including the attached *amici* brief, was sent via email to the listed counsel of record for the parties.